

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA  
CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

LI SHAOMING, MO HAILONG, a/k/a Robert Mo, WANG LEI, WANG HONGWEI, YE JIAN, and LIN YONG,

Defendants.

Criminal No. 4:13-cr-147

DEFENDANT MO'S UNOPPOSED  
MOTION FOR AN EXTENSION OF  
TIME IN WHICH TO FILE HIS  
APPEAL TO THE DISTRICT COURT  
FOR REVOCATION OF  
MAGISTRATE JUDGE'S PRE-TRIAL  
DETENTION ORDER

Defendant Mo Hailong (“Mo”), by and through his undersigned counsel, respectfully moves this Court, pursuant to Local Rule 7(k), Local Criminal Rule 5(a) and Title 18, United States Code, Section 3145(b), for a four-week extension of the time in which to file his Appeal to the District Court for Revocation of the Pre-Trial Detention Order Issued by United States Magistrate Judge Dave Lee Brannon, Southern District of Florida. In support of his unopposed motion, Mr. Mo states the following:

1. Mr. Mo was arrested in the Southern District of Florida on December 11, 2013. Following his initial appearance, Mr. Mo was detained pending a detention hearing on December 13, 2013. On December 20, 2013, following the hearing, Mr. Mo was ordered detained pending trial by United States Magistrate Judge Dave Lee Brannon.

2. Thereafter, the Bureau of Prisons transferred Mr. Mo to the Southern District of Iowa, where he remains detained.

3. Mr. Mo made his initial appearance in the Southern District of Iowa before Magistrate Judge Ross A. Walters on January 24, 2014, and was arraigned before this Court on the Indictment on January 29, 2014.

4. Pursuant to Local Criminal Rule 5(a), Mr. Mo must file any appeal of Magistrate Judge Brannon's detention order within 14 days of his January 24, 2014 initial appearance before this Court—in other words, by February 7, 2014.

5. Mr. Mo's counsel is seeking to reach an agreement with the government regarding conditions of bail that would reasonably assure the government of Mr. Mo's continued presence in court. If these discussions are successful, Mr. Mo plans to present an unopposed package of bail conditions to this Court for its consideration. Mr. Mo wishes additional time in order to continue his discussions with the government and hopefully obviate the need for his appeal. He believes that a continuance of four weeks will be sufficient.

6. Mr. Mo's counsel has conferred with Assistant United States Attorney Jason T. Griess regarding his request for an extension, and Mr. Griess indicated that he has no objection.

7. Trial in the matter is currently set for March 31, 2014. The date by which Mr. Mo must file his appeal of the magistrate judge's detention order has not been continued or extended previously.

WHEREFORE, for the reasons stated above, Mr. Mo requests that this Court extend by four weeks, until March 7, 2014, the time in which to file his Appeal to the District Court for Revocation of the Pre-Trial Detention Order Issued by United States Magistrate Judge Dave Lee Brannon, Southern District of Florida.

**ORRICK, HERRINGTON & SUTCLIFFE, LLP**

By: /s/ Walter F. Brown, Jr.

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ATTORNEYS FOR DEFENDANT MO HAILONG

**PROOF OF SERVICE**

The undersigned certifies that the foregoing instrument was served upon the parties to this action by serving a copy upon each of the attorneys listed below on February 7, 2014, by

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| <input type="checkbox"/> U.S. Mail                             | <input type="checkbox"/> FAX               |
| <input type="checkbox"/> Hand Delivered                        | <input type="checkbox"/> Electronic Mail   |
| <input checked="" type="checkbox"/> FedEx/Overnight<br>Carrier | <input checked="" type="checkbox"/> CM/ECF |

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